

Exhibit “D”


4. My attorneys have discussed with myself and the other Plaintiffs the potential advantages and disadvantages of proceeding in a class action rather than individually. After those discussions, the other Plaintiffs and I decided that it was best to proceed with a class action instead of individual lawsuits against the Defendants.

5. I am thankful that the other workers have come forward to hold those who ran “old Scribe” and those who are running “new Scribe” accountable for what they did to us. I further support approval of this class certification because I do not have the resources to file a case individually on my own behalf.

6. I do not have any additional claims beyond the violations of the WARN Act, and I do not presently or potentially have any claims in conflict with any members of this class.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct.

Executed on: 04/25/2024


Esty Pittman (Apr 25, 2024 09:40 CDT)
Esty Pittman